

EXHIBIT “1”

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1 manufacture?
 2 A. Let me count, because I want to try -- I'm
 3 not going -- again, I'm going to use a
 4 number that I just -- I think it's going to
 5 be six or seven.
 6 Q. Okay. Now, do the engineers do any of the
 7 manufacturing work?
 8 A. Their responsibility does not do that, but
 9 they do assist from time to time.
 10 Q. Okay. And to sort of get a picture in my
 11 head, once a unit is produced, I would
 12 assume it's boxed somehow, and your
 13 manufacturing people would do that and move
 14 it to some location to be sold?
 15 A. We have an assembly line process. At the
 16 end of the line it's quality checked, and
 17 then it goes into a carton and is closed
 18 up, yes.
 19 Q. How many people are currently involved in
 20 management with Amtren?
 21 A. Currently? Five. Let me count...
 22 MR. TRAWICK: To keep from
 23 confusing the court reporter,

1 Q. What's her title?
 2 A. Accounting manager.
 3 Let me clarify that. It's accounting
 4 and business management.
 5 Q. And Derrick Garrett?
 6 A. Service manager.
 7 Q. And Michael Rogers?
 8 A. He's the logistics and inventory manager.
 9 Q. Is he that person that we were talking
 10 about that would purchase and --
 11 A. Exactly.
 12 Q. -- do inventory control and so on?
 13 A. Yes.
 14 Q. Okay. And typically service manager to me
 15 means something in a retail setting, but
 16 what does your service manager do?
 17 A. Our service manager receives calls from the
 18 customer. He manages a small group,
 19 there's only two in it, but they're the
 20 calls that come in from the customer with
 21 issues regarding the systems.
 22 Q. Okay.
 23 A. Questions that -- you know, it's service

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1 if you verbalize your
 2 thoughts, she takes it down.
 3 THE WITNESS: Sorry about that.
 4 My apologies.
 5 A. I'm going to say five.
 6 Q. Okay. And I'm assuming that you are one of
 7 those?
 8 A. Yes, that's correct.
 9 Q. You are the president and CEO?
 10 A. That's correct.
 11 Q. Who are the other four?
 12 A. By name, Bobby Lake, Susan Seeber, Derrick
 13 Garrett --
 14 Q. Derrick?
 15 A. D-E-R-R-I-C-K, Garrett, G-A-R-R-E-T-T, and
 16 Michael Rogers.
 17 Q. What is Bobby Lake's title?
 18 A. His title is general manager. There's a
 19 secondary title with that, too, controller.
 20 Q. Is Susan Seeber --
 21 A. Seeber.
 22 Q. Seeber?
 23 A. Yes, uh-huh (positive response).

1 calls similar to if you would call a
 2 manufacturer for help with a product.
 3 Q. And the accounting manager?
 4 A. Susan?
 5 Q. Yes.
 6 A. What was your question?
 7 Q. What specifically does she do?
 8 A. Susan is responsible for the accounts
 9 payable, the accounts receivable, the
 10 basically matching the purchase orders with
 11 the packing lists. I would say primarily
 12 any accounting duty up and to the
 13 production of -- in fact, I guess all
 14 accounting areas. She also manages the
 15 front office, too, anybody in the front
 16 office.
 17 Q. Okay. Does she do like monthly income
 18 statements?
 19 A. Yes, she does.
 20 Q. Financial statements for the end of the
 21 year?
 22 A. Yes, she does. Those are nonaudited, just
 23 output type reports. And she does,

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1 actually, some of them weekly.
2 Q. Okay. Is she also responsible for writing
3 checks?
4 A. Yes, she is.
5 Q. Making payments to Blue Cross Blue Shield?
6 A. Yes, she is.
7 Q. And tax payments?
8 A. Yes, she is.
9 Q. Is she a CPA?
10 A. No, she is not.
11 Q. To try to shorten things a little bit, I'm
12 going to say I think the general manager is
13 responsible for everything; is that right?
14 A. The general manager in the role is -- yes,
15 operations and -- I call it the front
16 office, if you will. It would be the
17 service and the purchasing and the
18 accounting areas, yes.
19 Q. Okay.
20 A. I think that's correct.
21 Q. And how is that role different from that of
22 controller?
23 A. The controller title in Mr. Lake's

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1 situation is because he is the CPA, and he
2 does review our accounting output; thus,
3 the title is, if you will, a co-title to
4 allow that role to be a double check for
5 the accounting system.
6 Q. Okay. When was Bobby Lake employed as
7 general manager and/or controller?
8 A. I believe the dates are somewhere -- we can
9 verify this. It would be January or
10 February of this year. We can verify the
11 exact date if you want to. I do know it
12 was the beginning of this year.
13 Q. Okay. How about Susan Seeber?
14 A. I believe her role -- it would be in the
15 fall of last year. It would be somewhere
16 around October -- again -- September,
17 October, I believe.
18 Q. Was Susan Seeber hired into the position of
19 accounting manager or --
20 A. Yes, she was.
21 Q. Okay. And I want to ask the same question
22 about Bobby Lake. Was he hired as general
23 manager or did he have some other position

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1 before that?
2 A. No, he was hired in as general manager.
3 Q. Okay. What about Derrick Garrett? How
4 long has he been with you?
5 A. Again, I'm going to estimate 2003. Late
6 2003, early 2004.
7 Q. And Michael Rogers?
8 A. Spring of 2006. Exact month, I would
9 estimate May.
10 Q. Who did Mr. Rogers replace?
11 A. At the time of his employment?
12 Q. Yes.
13 A. Wayne Crabtree.
14 Q. And who did Derrick Garrett replace?
15 A. The position did not -- it's a growth
16 position. It did not exist.
17 Q. New position?
18 A. Yes.
19 Q. And whom did Susan Seeber replace?
20 A. Lisa McNamee.
21 Q. And Bobby Lake?
22 A. New position.
23 Q. Do you recall the date that Janice McCollum

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1 was initially employed?
2 A. The dates of her employment?
3 Q. Yes.
4 A. January of 2004 through April of 2005.
5 Q. Okay. Who was responsible for hiring her?
6 A. I was.
7 (Plaintiff's Exhibit 1 was marked
8 for identification.)
9 Q. If you would look at -- I'll represent to
10 you this is Amtren's responses to
11 Ms. McCollum's discovery requests. Have
12 you ever signed a copy of this?
13 MR. TRAWICK: Yes.
14 A. Yes.
15 MR. TRAWICK: We can get you a
16 signed copy.
17 MR. JACOBS: I'm not sure that I
18 have one.
19 MR. TRAWICK: My recollection is
20 we sent this to you and told
21 you we would supplement with a
22 signed copy.
23 MR. JACOBS: That you would get a